



M O S K O W I T Z & B O O K , L L P

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April 28, 2016

**BY ECF**

United States Magistrate Judge Vera Scanlon  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Osvaldo Maria-Vasquez  
16 M. 256

Dear Magistrate Judge Scanlon:

On March 31, 2016, the above-captioned defendant was arrested on a criminal complaint and was presented before Magistrate Judge Pollack. At the presentment, Mr. Vasquez agreed to a permanent order of detention without prejudice because he was not prepared to make a bail application. Subsequently, on April 6, 2016, Mr. Vasquez appeared before Magistrate Judge Kuo and was released on a \$75,000 bond co-signed by six sureties. As a condition of the bond, Mr. Vasquez's travel was limited to the Eastern and Southern District of New York. Additionally, Mr. Vasquez was prohibited from returning to the Tire Shop where he had been employed.

Since his release, Mr. Vasquez has sought new employment and has obtained a job as a driver for Uber. In connection with that job, it is likely that he will have occasion to pick up clients who will request to be driven to New Jersey or Connecticut. Mr. Vasquez is therefore requesting that the Court modify his bail conditions to permit him to travel anywhere in the tri-state area (New York, New Jersey and Connecticut), provided that it is for the purpose of his employment.

I have contacted AUSA Jennifer Carapiet, who informed me that the Government has no objection to the proposed bail modification.

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If the proposed bail modification is acceptable to the Court, please return an endorsed copy of this letter to me at the Court's earliest convenience.

Thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Avraham C. Moskowitz", with a stylized flourish at the end.

Avraham C. Moskowitz

ACM:bgb

cc: AUSA Jennifer Carapiet (by e-mail)